

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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DISH NETWORK L.L.C.,

Plaintiff

- vs -

Case No. 23-cv-09071

MASSIVE WIRELESS, INC., KHALID
AKHTAR, RAYS IPTV LLC, MUMTAZUR
REHMAN DAUD, and DOES 1-10, d/b/a Clo TV.
Defendants.

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INITIAL DISCLOSURES BY MASSIVE WIRELESS, INC.
and KHALED AKHTAR (“Answering Defendants”)

Pursuant to Federal Rule of Civil Procedure 26(a)(1), defendants

MASSIVE WIRELESS, INC. and KHALED AKHTAR by their attorneys, The Law
Offices of Andrew Moulinos, provide the following as and for their initial
disclosures.

These disclosures are based on information presently known and reasonably
available to Answering Defendants and which Answering Defendants
reasonably believe they may use to support their defenses in this action.
Continuing investigation and discovery may cause Answering Defendants to
amend these initial disclosures, including by identifying other potential
witnesses and documents and by disclosing other pertinent information.
Answering Defendants therefore reserve the right to supplement or amend
these initial disclosures.

By providing these initial disclosures, Answering Defendants do not represent that they are identifying every document, tangible thing or witness possibly relevant to this action. In addition, these disclosures are made without Answering Defendants in any way waiving their right to object to any discovery request or proceeding involving or relating to the subject matter of these disclosures on any grounds, including competency, privilege, relevance hearsay, undue burden, confidentiality, or any other appropriate grounds. Furthermore, these disclosures are not an admission by Answering Defendants regarding any matter.

Each and every disclosure set forth below is subject to the above qualifications and limitations.

I. Individuals Likely to have Discoverable Information that Answering Defendants May Use to Support their Case:

a) KHALED AKHTAR

Address & Telephone Number: Witness may be contacted only through undersigned counsel.

Answering defendants reserve the right to call additional witnesses in the action as information becomes available through discovery or otherwise.

II. Description of Documents in Answering Defendants' Possession that they May Use to Support their Case

a) Receipts, invoices and correspondence.

III. Computation of Damages:

Answering Defendants have not asserted a claim for damages.

IV. Insurance:

There is no applicable insurance.

Dated: Astoria, New York
February 7, 2024

Respectfully submitted,

LAW OFFICES OF ANDREW MOULINOS

By: s/ *Andrew Moulinos*

ANDREW MOULINOS, Esq. (0217)

MASSIVE WIRELESS, INC.

KHALED AKHTAR

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